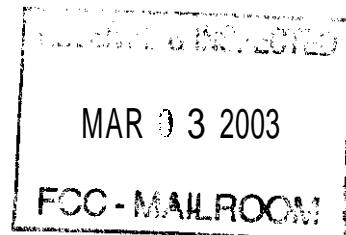


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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554



PETITION FOR RULE CHANGE

Petitioner:)
)
ale E. Reich)
41 North Center St.)
eville, Ohio 44273 - 9504)

RM DOCKET NUMBER _____

Changes Requested in Part's 2 - 90 - 95 - 97

With regards to the problems with the "Illegal Type" or "so Called" **Export CB / Ham** radios combinations manufactured and sold throughout the United States I request the FCC to consider this "RM" rule making request.

Equipment manufactured within the 25 Mhz to 30 Mhz range must be "Type" accepted for only "Authorized" radio services, and shall not be sold or marketed to transmit outside the "Authorized" frequency range in over the counter sales! Each new manufactured radio shall bear a "Type" acceptance or "Type Approval" tag and certificate. Each new radio shall bear a imbedded serial number unique to each radio. The Certificate attached to each radio will give the current official business address of the final manufacture U.S. Based address for factory and/or importer of the radio.

The owners manual or any papers that come with the radio will not show how to make any modifications to FCC regulations.

The tag will also bear the wording to the effect that repairs must be made by only a authorized or certified factory technician. Because the Export CB / Ham radio operates on international frequency below 30 Mhz it can only be repaired by licensed "Ham" operators or Commercial Radio Telephone [Of the Correct License Class] repair centers.

If the manufacture makes claim's that the radio can operate on CAP or MARS military frequency. they must seek certification from that agency as well as the Commission, to make such operation legal.

The Transmitter must be "Fixed on center of authorized frequency, unless a grant of Type Acceptance or Type approval is received from the commission. Most of the SSB export radio's VFO or Crystal VFO the transmitter through the PLL frequency control computer. So on all non "ham" [Amateur Radio] equipment there is no need to have the the PLL or TXO have the ability to VFO between channels.

If the unit is NBFM it must comply with the maximum frequency deviation of no more than 2.5 kc Max. The receiver must also comply with this new standard. In the Type acceptance of the radio it must be also have a factory seal for frequency and deviation controls to show if the radio can't be easily field modified. For the business user of Part 90 or [Like] services that are all ready licensed and "Grandfathered for this area this rule making will exempt them from the new standards. The Export standard for the Illegal radio standard is 5kc to 6kc common on radios tested in the past. This makes almost all the Illegal Export radios not even useable under part 90 if they apply for a STA or Waver

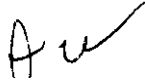
Radio Shops, retail vendors, and sales agencies would be required to register under the ULS to seek a FCC license to be a "Radio Transmitter Vendor" for marketing of Part 95 or 97 equipment. The registration and certificate to the vendor would be "free" if retail vendor operations takes place and continues at the same location. A small renewal fee shall be charged to the applicant later! The WTB would make the fine detail rules for this

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required licensing of the vendors of **sub** part in a public notice. Stores that exclusive only **sell** "Ham" or [Amateur Radio's] would be exempt from this requirement to license a retail store. Store listing on the FCC **web** would **also** make it easy to find original manufacture for authorized after market repairs, as well as "authorized" agents for purchases repairs! The normal business hours the manufacture and vendors must be posted on the FCC website for the manufactures of any equipment that is sold, manufactured, marketed, leased, or operated in the United States in the 25 Mhz to 30 Mhz Band .

VTB would be able to "fine tune" this requested "RM" under administrative rule changes and upon **posting** on the FCC public notices.

Thanks



Dale E.. Reich
141 North Center St.
Seville, Ohio 44273 - 9504

ak437@mail.acorn.net